


COOMBS, Terry
 Name
 1439 W. Chapman Ave.
 Orange, CA 92868
 Address

FILED 
 UNITED STATES DISTRICT COURT
 DISTRICT OF NEW MEXICO
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 CLERK-SANTA FE

UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF NEW MEXICO

COOMBS, Terry, Plaintiff
 (Full Name)

CASE NO. CV 21-806
 (To be supplied by the Clerk)

v.

FENN, Forrest; OLD, Zoe;
 KILE, Jenny;
 PRESTON, Douglas;
 SWIFT, Taylor;
 STUEF, Jack;
 Defendant(s)

CIVIL RIGHTS COMPLAINT
 PURSUANT TO 42 U.S.C. § 1983

A. JURISDICTION

1) COOMBS, Terry, is a citizen of USA
 (Plaintiff) (State)
 who presently resides 1439 W. Chapman Ave. Orange, CA 92868
 at (Mailing address or place of
 confinement)

2) Defendant FENN, Forrest ; (posthumously) is a citizen of
 (Name of first defendant)
 USA, and is employed as
 (City, State)

Old Sante Fe Trail, Sante Fe, NM . At the time the claim(s)
 (Position and title, if any)
 alleged in this complaint arose, was this defendant acting under color of state law?
 Yes ☐ No ☒ If your answer is "Yes", briefly explain:

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CIVIL RIGHTS COMPLAINT (42 U.S.C. §1983)

- 3) Defendant OLD, Zoe; KILE, Jenny (Pennsylvania); PRESTON, Douglas;
SWIFT, Taylor; STUEF, Jack is a citizen of
(Name of second defendant)
USA or it's Territories, and is employed as
(City, State)
Unknown residing addresses. At the time the claim(s)
(Position and title, if any)

alleged in this complaint arose, was this defendant acting under color of state law
Yes ☐ No ☒ If your answer is "Yes", briefly explain:

(Use the back of this page to furnish the above information for additional defendants.)

- 4) Jurisdiction is invoked pursuant to 28 U.S.C. §1343(3), 42U.S.C. §1983. (If you wish to assert Jurisdiction under different or additional statutes, you may list them below.)

B. NATURE OF THE CASE

1. An elderly Sante Fe man, F. Fenn, created a public advertised Treasure Chase Hunt in the Rockies in 2010 worth millions for a finder clue solver. 350.000 people searched for a Chest. The Chase is renown. I solved the location and the Treasure was not there at his special place in 2016.
2. I sent Fenn pictures and explanation in email (forrestfenn@gmail.com) so that he knew in Sept. 2016 that the hunt was over. I suggested that the Treasure Hunt was not a good situation for his NM location. He never replied. I waited years for him to announce that the Treasure was found. He might have said at any time that he did or did not know who found the treasure. After four years he announced that someone from back-east had found the treasure that week of June 6, 2020 in WY.
3. I investigated his hunt for those 4 years and found that his artifact digging search partner Jenny Kile knew the location in NM years before 6/6/2020. Fenn advertised many times that only he knew the location and that the Hunt was fair to all worldwide. I prove over & over that he told many people.
4. Then music star Taylor Swift wrote two albums in 2020 with main content based on the Hunt. She exposes in lyrics and videos that she knows the location and understands dozens of hints and clues released over the ten years. Swift is not a Treasure Hunter. The lyrics point to her knowing Fenn oddly well.
5. In July 2020, I sent Discovery Channel Treasure Hunter Josh Gates a fifty-page news article that I had put together by 6/10/2020 and released on Amazon Kindle: Title to the Gold, A treasure Hunt Solve, showing the location and proving that Fenn was running a scam on the Public. He did not reply and he continues to create more TV episode content for profit about the unsolved Fenn Hunt treasure location. He is helping a fraudulent conspiracy by doing his part which is to help push the Fenn name & legacy creation onto the Public. Gates may have an explanation not yet received by Plaintiff. His email is not included here for privacy. Also, Santa Fe New Mexican Reporter D. Prokop & Colorado Public Radio Reporter G. Hood have had my Solve Article information since 6/12/2020 & will not email reply or call me or report on it. It may be lack of due diligence. Either could have published this story.
6. I have written/published five 'tell all' News Articles beginning 6/10/2020 of a five-year investigation and exposing Fenn's Treasure Team. See ~180 pages of Proof Articles or search Amazon.com for the collection of News Articles titled: The Fenn Treasure Conspiracy, Solve Proof. Any correct solve of the Fenn Treasure Hunt must have been published before 6/10/2020 to be considered a legitimate real Solve that was discovered & concluded without tampering from Fenn Insiders with knowledge of the real Solve in which was not supposed to be in the public realm or it came from my News releases on Amazon. Dozens or hundreds of Fenn friends & Insiders know the real Solve, my Solve, but must keep their secrets because Fenn said that only he knows the Solve. That would be the only way to claim a fair & unrigged international game. I have never spoken to, corresponded, live streamed with, or obtained any Hunt solve information from any other Searcher as of today. I had one retrieving helper go to the NM mountain location.
7. Fenn gave his Treasure to his friend/partner J. Kile. Once there would not be a Treasure for any real Searcher, he said that his intentions for the Hunt Chase is about 'getting people out in the Rockies with friends & family for the fun & memories'. But the real Searchers are outraged over the Treasure Hunt secrecy & obvious hoax ending being acted out by J. Stuef as Finder. This Complaint exposes & explains the Fenn Treasure Chase fraud. Fenn, Old, Kile, Preston, Stuef & Swift are Fenn Treasure Chase 'Insiders'.

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C. CAUSE OF ACTION

- 1) I allege that the following of my constitutional rights, privileges or immunities have been violated and that the following facts form the basis for my allegations: (If necessary, you may attach up to two additional pages (8 1/2" x 11") to explain any allegation or to list additional supporting facts. A)(1) Count I:

What: Conspire to falsify, participation in fraudulent activities, of the Plaintiff as to never be responsible for wrongfully retrieving Treasure. Events creation to fool Plaintiff into wanted Treasure status beliefs: Who: All Defendants are Co-conspirators: When: 2013-2021 Against world advertisements that a treasure was out in the Rockies 2010-6/2020. I am the first Real Solver of the Hunt. **How:** Said person(s) drove out to the location in NM & picked it up. Dozens or hundreds of people know the location and Solve, my solve, but all were helped or told the Solve by Fenn or his Insiders. The Hunt was advertised worldwide in print and TV that the First Solver would be the Owner of the Treasure. Millions of people are aware of Fenn and his Hunt. Fenn and Kile published hundreds of clues over the ten years. **Why: Control. Legacy. Retain his investment for a better cause than allowing a stranger to have it.** The Treasure was never meant for a real Searcher to find after Kile was chosen. It was in control of Fenn & Kile and would act as payment for Kile to create & build his fame.

- (2) Supporting Facts: (Include all facts you consider important, including names of persons involved, places and dates. Describe exactly how each defendant is involved. State the facts clearly in your own words without citing legal authority or argument.)

1. The Fenn Estate, managed by Z. Old, will stop at nothing to manipulate this Treasure & Hunt. Old said the Estate does not have the Treasure. The Treasure has already been given/sold to T. Swift or another of the group Insiders. J. Stuef said that he is waiting for the Treasure. Where is it? Who has it? Fenn's emails may have all been deleted back to 2000 by Old. A cover-up has been underway for years. This Treasure is not going to any real Solver if they have their way. This is not a normal situation. The Fenn Will appears to be missing his list of thousands of his possessions & values somehow after a year since he passed. Is this part of the Hunt scam? What if someone was Willed the \$2.5M in Treasure? The Treasure list of contents may be gone. Jonathan Jack Stuef could call foul but does nothing. Even if Stuef emerges with the Treasure now, it could be a continuation of the fraud. Any sale of the Treasure can never be trusted as real. Only the Real Solver holding the Treasure proves a direction away from fraud & toward a direction of resolve & closure & asking for forgiveness for the Fenn Insiders.

2. See MysteriousWritings.com. Fenn & Kile posted new clues on Kile's website each week for years. They are partners in the Fenn Hunt. Fenn was already aged. He hired more help to answer emails, create other websites/content & go on TV shows. Millions worldwide now know of Forrest Fenn because of his famous American treasure hunt. They spent time together back in 2012 to create picture clues at San Lazaro..

3. J. Kile created and released a clue for Fenn in 2016 **about India**. Fenn confirms 8/12/2016. See YouTube.com video titled: (MW Answers: Forrest Fenn Treasure, Little Girl from India, and BOTG Question) see 3:54 mark. She doesn't understand that she contradicts herself and exposes that she created the first question clue about India per Fenn statement. The clue is not just about a girl. It is about the NM Treasure location. **A one-half mile river cut (it's one in a billion chance) geo-formation** that is exactly the shape of India and it appears as a geo cup holder for the mountain location of the hidden treasure, & serves as a pull-out from a river for Searching, & is 8.25 miles (Fenn clue) from the put-in point from the poem of clues. It's an impossibility for her to create such an amazing clue about India without exact location knowledge. See Articles for pictures and pages of explanations. See pages 80-82.

4. Kile exposes her knowledge of the Flutterby Bracelet clues & maverick rock key-slot & Winds in the Willows clues from the India video. Bookcase arrangement clues are common in the Hunt. Winds in the Willows is right there in the video for all to see. She understands the toad & maverick clues. See pages 26-28. She started exposing her location knowledge in 2016 & to this day calls herself a Fenn Treasure Searcher. She is not a real Searcher. She is a paid Insider, narrative creator, Chase controller, event creator, Hunt ending manipulator, Fenn Treasure Team Leader.

5. Fenn friend D. Preston stated at a Public interview on You Tube titled: (Forrest Fenn, Douglas Preston & Shiloh Old at Collected Works Bookstore, November 2, 2017) that he knows the new book had new vital clues at the **14 to 16 minute mark**. Fenn's plan for the Hunt in the mid 90's inspired Preston to write a bestseller book called the Codex. Fenn had told Preston Hunt details against advertising otherwise. Preston is exposed & is a friend/Consultant of the hoax hunt. Also, Preston stated/posted on a stream in 7/2020 that **"only Cinderella is happy"** about the ending. Cinderella is the name that J. Kile gave herself years ago. She is a rags to riches story. Preston's post assures us that Kile had the Treasure in 7/2020.

6. Fenn told T. Swift Hunt details and clue solves as exposed in her work that won Grammy Album of the Year 2020 and her net worth has risen fifty million dollars. She continues to lead the Public on a scam Hunt ending and praises Fenn's deceit of the Public & any real Solver. Willow is a common clue of the Hunt, Pages 26-28, 137-141. Music videos willow, cardigan, tolerate it, invisible strings, [renegade, crevice shape on little finger at 2:58.5 mark & others] see pages 181-204 all expose her knowledge. Most of the folklore and evermore albums & videos have lyric and shape New Mexico clues. She presents the rock key-slot shape clue. And Fenns angle. See pages 183. She re-creates dozens of Hunt clues. The work has set Industry sales records. The 2/2021 Grammy TV performance included many real NM clues. T. Swift's intentions are to create, use the Hunt as a muse, and she does not need to worry about any complications of exposing her knowledge. She may have the Treasure now in NY.

7. The Treasure Team assures themselves that their fraudulent deeds are righteous & honorable with a narrative that World Tourist Savages will trash on our BLM land & must be kept ignorant forever of the Real NM Hunt Solve - as the Team accepts payment & the proceeds of Treasure in gold, diamonds & rubies. My investigation is searching for a missing emerald ring potentially being held by T. Swift. If Fenn would have done as he said, & never told or given extra secret clues to anyone, then I would be holding the Treasure, since 2016. Time has passed & the Conspirators have made many moves that fully expose themselves. The location has been public on Amazon.com since 6/10/2020 for any good Searcher or Fenn Treasure Team or Insider or Reporter to find.

8.Fenn planned before 2010 to use a secondary location if the Hunt was solved in less than ten years or his NM was too controversial. A recurring theme, Fenn's main goal of a Hunt was to create a long-lasting public legacy for himself before his passing. He placed some hints in his well sold books in 2010 about the hunt that would be a backup and thus move the Treasure location from the primary location in New Mexico to a fake secondary location in Wyoming. Fenn or Kile were artificially aging the Chest at home from 2013-2020 and contents for many years but made mistakes that expose their deceit of the Searchers worldwide. Pages 206-207

9.When Stuef presented his new-found treasure contents in Public released photos carefully exposing clues in 2020, some of the gold was spotless and unaged like the Chest. Stuef said he had cleaned the contents in a motel room which was impossible with his towel. He points the Toad nose at an oval bracelet & the NM key-slot location exposing that he understands the real NM Solve. The mouse is pointed against an oval. The second toad nose in upper left photo is against an oval. It is all staged by Stuef and others. Dozens of other supporting facts & Treasure Team mistakes are in the News Articles. Fabrications may be released to invalidate each Fact on this document. The Fenn Treasure Team has been paid well to manipulate any truth or solve. Their Testimony along with others will expose the conspiracy.

10.Others participation is concluded in the Articles and may be presented during Court proceedings. Millions of Fenn Hunt Followers globally deserve the real story. The Fenn Treasure Team must think that a Real Solver does not exist or they would not have been so daring to place multiple NM Solve clues in so many of their fake WY public releases. The Team has many supporters not named here that each know pieces of/or NM/WY Solves. The Treasure Team has been causing terrible distress for disgruntled Searchers & will try to find a way to discredit this Complaint. It is all secret so they do what they want. The Treasure moves around. The Conspirators view the large Search Community as Pawns that need to go away without closure. Stuef will be paid off soon, but if Treasure is used then that may be a hoax also. The Fenn Estate with Insiders can change anything at any moment to discredit allegations. And once again, this week, they will alter course to try to preserve the Chase integrity & Treasure.

11.Searchers were dying in the Rockies as each year passed 2016-2020. Police were asking to end it. A believable scam ending could save all of their 'honest treasure hunt Guru' reputations and Fenn as a 'rich & famous good guy'

12.I am the only Searcher to Solve the clues & find the blazes & mountain & crevice & go down into the cave at Fenn's angle tied off with ropes to his tree, to the NM Treasure location with absolute zero chance of being wrong. There are Searchers who like the location as their Solve, but they have not solved the clues, the Flutterby Bracelet shape & the other thirty clues that point to this place. One must still solve the crevice shape clues to be 100% correct which then raises one to a full Hunt Solver & to a level of being defrauded. No one could prove that there was not a treasure in the Rockies since 2013, if not one person ever solved the Treasure Hunt 100%. I fully solved in 2016. A few Searchers made it to the Treasure area but could not solve that they had found the Treasure location. On visits, I leave items were the Treasure rested in 2010, and the items have not been moved in the last five years.

13.Fenn (or email reader paid employee) believed that I was guessing about the location & had not solved the dozens of clues. This fact is why all Conspirators believe that they never have to release the Solve or location to the Public.. J. Kile has made many moves such as a fake poem cypher release to quiet people but she always makes mistakes. Fenn allowed her the Treasure & Hunt control after 2013, He said it himself that he was old & retired to a chair & turned it all over in 2013 and then he sadly watched as she took his Hunt down, till he knew it was his time to go in 2020. Swift writes about it. He never congratulated Stuef because Stuef had done nothing.

14.Kile has to make herself look innocent of working with Fenn & accepting the Treasure with a wink. Swift winks at the Fenn Insiders in her cardigan TV commercial. The Fenn Treasure Team & Insiders are two sets of different people, except for Kile. The Team are worker bees while Insiders are a secret group. The 350k Searchers worldwide will not accept that a Fenn partner/employee ran off with the Treasure. Preston said Cinderella was happy.

15.Stuef may have only seen the Treasure once, from a photo shoot with Fenn in 2020. The Co-conspirators were there to set-up the clues in the Fenn/Stuef photos, see pg. 207. Stuef said that the WY blazes clues are all gone & only he knows the nook location of his Treasure. It's very convenient that there are not any clues for WY that pin down the exact spot. The location in NM has dozens of clues that pin down the exact spot i.e. flutterby, India, toad, maverick key-slot, sketch of man looking at the moon with a dove, sketch of gypsies.

16.They all will not stick to Kile's & Old's & Fenn's manipulation stories because they received almost nothing compared to her take of the Treasure Loot. And then watching some new guy, Stuef, get paid \$2M in Puerto Rico after their years of hard work for Fenn & his legacy. Now, Old &/or Kile appear to be holding the Treasure from Stuef. They will decide the Treasure's fate. Stuef is somehow very close to them to trust that he will get paid one day. I parody in the Articles that it is a secret society type connection. It's all obvious to millions worldwide that there are secret puppet-masters ruling over the Hunt hoax ending. It's Kile, Old & Preston (Consultant). Many people have good reason to 'tell all' but Insiders will be reluctant to talk. The Fenn Treasure Team workers (not named here) do not know the Insider Elites.

17. Please allow me to present before the Court, my dozens of allegation proofs. Most are in the News Articles & submitted with the Complaint for review.

D) PREVIOUS LAWSUITS AND ADMINISTRATIVE RELIEF

Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to the conditions of your imprisonment? Yes ☐ No ☒ If your answer is "YES", describe each lawsuit. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

a) Parties to previous lawsuit.

Plaintiffs: _____

Defendants: _____

b) Name of court and docket number:

c) Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?)

d) Issues raised:

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e) Approximate date of filing lawsuit:

f) Approximate _____ date _____ of _____ disposition:

I have previously sought informal or formal relief from the appropriate administrative officials regarding the acts complained of in Part C. Yes ☐ No ☒ If your answer is

"Yes", briefly describe how relief was sought and the results. If your answer is "No," briefly explain why administrative relief was not sought.

E. REQUEST FOR RELIEF

1) I believe that I am entitled to the following relief:

The Treasure, full rights, documentation, history of each item, certificates	2.5M + penalty
Missing advertised contents, audit required	
Solving, searching, investigating, investing, traveling for years	
Defrauded into false belief that this Treasure could be found by anyone including me	2.5M

Relief: The full advertised Treasure in full weathered corroded condition, rusted key & willow twig & missing emerald ring, original artwork of man in overalls & gypsies sketches of clues, original digital file of flutterby in drawing format, any real mock-up of the flutterby, the contact information of any holders (spallies) of any flutterby bracelet, documentation, history of each item, all certificates, currently held by Z. Old, and/or J. Kile, J. Stuef, T. Swift, others plus \$1,000,000 & any Attorney fees & tax liability

Or Option 2: \$5,000,000 plus any Attorney fees.

To be decided

Signature of Attorney (if any)



Signature of Petitioner

DECLARATION UNDER PENALTY OF PERJURY

The undersigned declares under penalty of perjury that he is the plaintiff in the above action, that he has read the above complaint and that the information contained therein is true and correct. 28 U.S.C. Sec. 1746. 18 U.S.C. Sec. 1621.

Executed at Sante Fe, New Mexico

(Location)

on ^{20th} 16th of August 2021.

(Date)



Terry Coombs

(Signature)

Careful picture set-up by the Finders 6/6/2020

Full circle for the Green Rock Key clue.

2011 to the 2020 end of Chase.

Forrestfenntreasure.com said to look at the key and that this is a clue. It's pointed at the rusty 1903 Lady who is looking at some nuggets that fit together exactly like what



we have seen in clues before. The Rock Key shape.

Did you barely notice that the Green Rock Key is there, in it's place, in the Chest?

Mirrored at the top narrows. I never planned to do an Article so did not worry about great pictures. I was lucky to have these pictures.

This is another eye opener for Searchers. It's undeniable. It's the Fenn Treasure Solve.

